

1 LATHAM & WATKINS LLP  
 2 James L. Day (Bar No. 197158)  
 3 Xóchitl D. Arteaga (Bar No. 227034)  
 4 Melanie E. Griswold (Bar No. 234917)  
 5 Seth R. Morris (Bar No. 244910)  
 6 Kateryna L. Rakowsky (Bar No. 246248)  
 7 505 Montgomery Street, Suite 2000  
 8 San Francisco, California 94111-2562  
 9 Telephone: (415) 391-0600  
 10 Facsimile: (415) 395-8095

11 Attorneys for Plaintiff,  
 12 ALFREDO GONZALEZ

13 UNITED STATES DISTRICT COURT  
 14 NORTHERN DISTRICT OF CALIFORNIA  
 15 SAN FRANCISCO DIVISION

16 ALFREDO GONZALEZ,  
 17 Plaintiff,

18 v.

19 P.J. DENT,  
 20 Defendant.

CASE NO. CV 04-00107 VRW

**STIPULATION AND [PROPOSED] ORDER  
 TO EXTEND DISCOVERY DEADLINES  
 AND TO TAKE ADDITIONAL  
 DEPOSITIONS**

The Honorable Vaughn R. Walker

21 IT IS HEREBY STIPULATED AND AGREED, among Plaintiff Alfredo  
 22 Gonzalez ("Plaintiff") and Defendants P.J. Dent ("Defendant"), through their counsel of record  
 23 in the above-captioned matter, that good cause exists to continue the following dates, initially set  
 24 in the Court's Case Management Order of March 3, 2007 and revised in the Court's Minute  
 25 Order of June 5, 2007:

- 26 1. Fact Discovery Cut-Off: From July 27, 2007, to August 17, 2007.
- 27 2. Initial Expert Reports: From July 16, 2007, to August 31, 2007.
- 28 3.. Rebutal Expert Reports: From August 13, 2007, to September 10, 2007.

1 All other dates previously set by the Court's Case Management Order remain  
2 unchanged.

3 It is further stipulated and agreed that that the parties each desire leave of the  
4 Court to take an additional five (5) depositions over the ten (10) deposition limit set forth in  
5 Federal Rule of Civil Procedure 30(a)(2)(A), for a total of fifteen (15) each.

6 Good cause exists for this alteration to the schedule and total number of  
7 depositions because of ongoing discovery disputes to be resolved at the July 25, 2007 hearing,  
8 the number of necessary witnesses, and the resulting protracted nature of the discovery process.  
9 It is so stipulated, through counsel of record as indicated below.

10

11

12 Dated: June 25, 2007

LATHAM &amp; WATKINS LLP

13

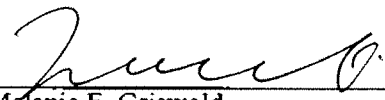
14

15

16

17

By

  
Melanie E. Griswold,  
Attorneys for Plaintiff Alfredo Gonzalez

18 Dated: June 26, 2007

EDRINGTON, SCHIRMER &amp; MURPHY

19

20

21

22

23

24

25

26

27

28

LATHAM & WATKINS LLP  
ATTORNEYS AT LAW  
SAN FRANCISCO

2

STIPULATION AND [PROPOSED] ORDER GRANTING  
PLAINTIFF ACCESS TO CONFIDENTIAL ATTORNEY-CLIENT  
TELEPHONE CALLS  
CASE NO. CV 04-00107 VRW

06/27/2007 10:25 FAX 925 827 3320

ESM

004

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

1. Fact Discovery Cut-Off is August 17, 2007.
2. Initial Expert Reports are due August 31, 2007.
3. Rebutal Expert Reports are due September 10, 2007.

Date: June 28, 2007

SF615630.2

